

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al.,
Plaintiffs,
v.
GOOGLE LLC,
Defendant.

Case No. [20-cv-04688-RS](#)

**ORDER GRANTING IN PART AND
DENYING IN PART MOTION TO
SEAL**

I. INTRODUCTION

In this privacy action, Plaintiffs and Defendant (Google) have filed an omnibus motion to seal various portions of materials related to the parties' class certification and *Daubert* briefing. Specifically, the parties request to seal portions of briefing related to Plaintiff's Motion for Class Certification, expert reports and related appendices, as well as Google's *Daubert* Motion and related appendices. For the reasons below, the parties' omnibus motion to seal is granted in part and denied in part.

II. LEGAL STANDARD

There is a strong presumption in favor of allowing public access when deciding whether materials should be sealed. *See Apple Inc. v. Psystar Corp.*, 658 F.3d 1150, 1162 (9th Cir. 2011). A request to seal must be narrowly tailored. Civ. L. R. 79-5(c)(3). The Ninth Circuit articulates two tests to determine whether a record may be sealed, the "compelling reason" standard or the "good cause" exception. *Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1178 (9th Cir. 2006); *Ctr. for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092, 1095–96 (9th Cir. 2016). Where

a motion is “dispositive,” the compelling reasons standard applies. *Ctr. for Auto Safety*, 809 F.3d at 1095. The Ninth Circuit has not yet decided if a motion to certify class is dispositive or non-dispositive. *Santos v. TWC Admin. LLC*, No. CV 13–04799 MMM, 2014 WL 12703020 at *2 (C.D. Cal. May 27, 2014). Districts in the Ninth Circuit generally treat motions for class certification as non-dispositive. *Id.* However, a motion for class certification can be dispositive where “denial of class status means that the stakes are too low for the named plaintiffs to continue the matter.” *Id.* (quoting *Prado v. Bush*, 221 F.3d 1266, 1274 (11th Cir. 2000)). Where a litigant presents compelling reasons to seal material, the court must then balance the interests of the public and the party seeking sealing. *Ctr. for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092, 1096–97 (9th Cir. 2016). This balancing test involves such factors as the public’s interest in understanding the functioning of the judicial process and the volume of material sought to be sealed. *See Zakinov v. Ripple Labs, Inc.*, No. 18-cv-6753, 2023 WL 5280193 at *1 (N.D. Cal. Aug. 15, 2023). “The mere fact that the production of records may lead to a litigant’s embarrassment, incrimination, or exposure to further litigation will not, without more, compel the court to seal its records.” *Kamakana*, 447 F.3d at 1178.

III. DISCUSSION

Google requests to seal what it characterizes as commercially sensitive information, internal code names, and non-public employee email addresses. Google asserts that it seeks to seal excerpts of internal studies and research because they contain “competitively sensitive materials.” Google invokes *Algarin v. Maybelline* as an example of a case where a study that contained consumer research and sales data and was sealed because it could be subject to improper use by a competitor. No. 12cv3000 AJB (DHB), 2014 WL 690410 (S.D. Cal. Feb. 21, 2014). However, much of the information Google seeks to seal will not actually harm its competitive standing and, unlike in *Algarin*, simply reflects the opinions of Plaintiffs’ experts, resulting in no danger of “improper use by competitors who may circumvent expending their own resources in obtaining information at [Google’s] expense.” *Id.* at *4.

Google also asserts the records it seeks to seal contain business information that might

harm their “competitive standing” or “become a vehicle for improper use” such that those compelling reasons outweigh the public’s interest in disclosure. *See In re Elec. Arts, Inc.* 298 F.App’x 568 (9th Cir. 2008) (internal quotations omitted). Plaintiffs oppose sealing some of Google’s records on the basis that they may affect the rights of absent class members.

The motion to seal is granted in part and denied in part. For some records, Google has adequately shown “compelling reasons” warranting the sealing of the records it selects. However, for others, preventing disclosure will impact information necessary to calculate Plaintiffs’ monetary damages, and many records Google seeks to seal are high level summaries that go directly to Plaintiffs’ claims. In addition, some of the records go directly to the public interest in disclosure and are not outweighed by any compelling reasons. The request to seal excerpts that reveals Plaintiffs’ private information is granted. Dkt. 338. As to the Google’s sealing request, the tables below outline which portions of the records may be sealed. No pages, paragraphs, or records may be sealed in their entirety unless stated otherwise. If the table reads “may be sealed only,” then the parties must seal only the word or short phrase that corresponds with that description, not the entire sentence or paragraph (unless, of course, the entire sentence or paragraph corresponds with that description).

The following records attached to Plaintiff’s Motion for Class Certification (Dkt. 315) may be sealed:

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
Exhibit 1	GOOG-RDGZ00117318	All columns except “Summary”
Exhibit 2	GOOG-RDGZ-00209974	Internal terms may be sealed only
	GOOG-RDGZ-00209975	Employee PII may be sealed only
	GOOG-RDGZ-00209976	Employee PII may be sealed only
Exhibit 5	GOOG-RDGZ-00144762	Internal strategy
	GOOG-RDGZ-00144763	Internal processes
	GOOG-RDGZ-00144764	Internal processes

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
	GOOG-RDGZ-00144767	Internal processes
Exhibit 7	GOOG-RDGZ-00024709	Employee PII may be sealed only
	GOOG-RDGZ-00024710	Employee PII may be sealed only
	GOOG-RDGZ-00024711	Employee PII may be sealed only
Exhibit 10	GOOG-RDGZ-00161367	Internal processes
	GOOG-RDGZ-00161373	Internal processes
	GOOG-RDGZ-00161378	Internal processes
	GOOG-RDGZ-00161384	Internal processes
	GOOG-RDGZ-00161385	Internal processes
	GOOG-RDGZ-00161392	Internal processes
	GOOG-RDGZ-00161393	Internal terms
	GOOG-RDGZ-00161395	Internal terms may be sealed only
	GOOG-RDGZ-00161396	Internal processes
	GOOG-RDGZ-00161397	Internal processes
	GOOG-RDGZ-00161398	Internal processes
	GOOG-RDGZ-00161399	Internal terms may be sealed only
	GOOG-RDGZ-00161401	Internal terms may be sealed only
	GOOG-RDGZ-00161406	Internal processes
	GOOG-RDGZ-00161408	Internal processes
	GOOG-RDGZ-00161410	Internal terms may be sealed only
	GOOG-RDGZ-00161411	Internal processes
	GOOG-RDGZ-00161412	Internal terms
	GOOG-RDGZ-00161414	Internal processes
	GOOG-RDGZ-00161417	Internal processes
	GOOG-RDGZ-00161418	Internal processes
	GOOG-RDGZ-00161419	Internal processes

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
	GOOG-RDGZ-00161420	Internal terms
Exhibit 11	212:16 – 212:21	Internal processes
	213:8 – 213:9	Internal processes
	214:10 – 214:14; 214:18 – 214:21; 214:23 – 214:25	Internal processes
	215:1 – 215:5; 215:9 – 215:10; 215:15 – 215:24	Internal processes
	216:2 – 216:4	Internal processes
	217:3 – 217:6; 217:8 – 217:15	Internal processes
Exhibit 15	GOOG-RDGZ-00052784	Employee PII may be sealed only
	GOOG-RDGZ-00052785	Internal terms may be sealed only
	GOOG-RDGZ-00052787	Internal terms may be sealed only
	GOOG-RDGZ-00052788	Internal terms may be sealed only
	GOOG-RDGZ-00052790	Internal strategy
	GOOG-RDGZ-00052791	Internal strategy
	GOOG-RDGZ-00052792	Internal terms may be sealed only
	GOOG-RDGZ-00052793	Internal terms may be sealed only
	GOOG-RDGZ-00052794	Internal strategy
	GOOG-RDGZ-00052795	Internal strategy
	GOOG-RDGZ-00052797	Internal strategy
	GOOG-RDGZ-00052798	Internal strategy
	GOOG-RDGZ-00052799	Internal processes Internal strategy
	GOOG-RDGZ-00052801	Internal strategy
	GOOG-RDGZ-00052805	Internal processes

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
	GOOG-RDGZ-00052806	Internal processes
	GOOG-RDGZ-00052807	Internal strategy
	GOOG-RDGZ-00052809	Internal processes
	GOOG-RDGZ-00052811	Internal strategy
	GOOG-RDGZ-00052812	Internal strategy
Exhibit 42	GOOG-RDGZ-00152018	Employee PII may be sealed only
	GOOG-RDGZ-00152027	Employee PII may be sealed only
	GOOG-RDGZ-00152029	Employee PII may be sealed only
	GOOG-RDGZ-00152040	Internal strategy
Exhibit 54	GOOG-RDGZ-0090236	Internal terms and Employee PII may be sealed only
	GOOG-RDGZ-0090238	Internal processes
	GOOG-RDGZ-0090239	Employee PII may be sealed only
	GOOG-RDGZ-0090242	Internal processes
	GOOG-RDGZ-0090243	Employee PII may be sealed only
	GOOG-RDGZ-0090244	Internal processes
	GOOG-RDGZ-0090245	Internal processes
	GOOG-RDGZ-0090246	Internal processes
	GOOG-RDGZ-0090247	Internal processes
	GOOG-RDGZ-0090249	Internal processes
	GOOG-RDGZ-0090250	Internal processes
	GOOG-RDGZ-0090251	Internal processes
	GOOG-RDGZ-0090252	Internal processes
	GOOG-RDGZ-0090253	Internal processes
Exhibit 55	GOOG-RDGZ-00043294 Complete document	Internal processes; Internal strategy;

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
		Internal terms; Employee PII
Exhibit 56	112:21 – 112:25	Internal processes
	113:1 – 113:2; 113:10 – 113:11	Internal processes
	114:8 – 114:11	Internal processes
	115:17 – 115:20	Internal processes
	116:1 – 116:8; 116:17 – 116:20	Internal processes
Exhibit 57	GOOG-RDGZ-00044356	Employee PII may be sealed only
Exhibit 59	GOOG-RDGZ-00173562	Employee PII may be sealed only
	GOOG-RDGZ-00173563	Employee PII may be sealed only
Exhibit 61	GOOG-RDGZ-00129084	Employee PII and internal figures may be sealed only
	GOOG-RDGZ-00129085	Employee PII may be sealed only
	GOOG-RDGZ-00129086	Employee PII may be sealed only
	GOOG-RDGZ-00129087	Employee PII may be sealed only
	GOOG-RDGZ-00129088	Employee PII may be sealed only
	GOOG-RDGZ-00129089	Employee PII may be sealed only
	GOOG-RDGZ-00129090	Employee PII may be sealed only
	GOOG-RDGZ-00129091	Internal terms (to the extent there are any) and Employee PII may be sealed only
	GOOG-RDGZ-00129092	Internal terms and Employee PII may be sealed only

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
	GOOG-RDGZ-00129093	Internal terms and Employee PII may be sealed only
	GOOG-RDGZ-00129094	Internal terms and Employee PII may be sealed only
	GOOG-RDGZ-00129095	Internal terms and Employee PII may be sealed only
Exhibit 65	GOOG-RDGZ-00092072	Employee PII may be sealed only
	GOOG-RDGZ-00092097	Internal processes
	GOOG-RDGZ-00092098	Internal processes
	GOOG-RDGZ-00092099	Internal strategy
	GOOG-RDGZ-00092100	Internal strategy
Exhibit 68	GOOG-RDGZ-00129096	Internal terms and Employee PII may be sealed only
	GOOG-RDGZ-00129097	Employee PII may be sealed only
	GOOG-RDGZ-00129098	Employee PII may be sealed only
	GOOG-RDGZ-00129099	Employee PII may be sealed only
Exhibit 69	GOOG-RDGZ-0130381	Internal terms and Employee PII may be sealed only

The table below lists exhibits to Google's Opposition to Plaintiff's Motion for Class Certification (Dkts. 323 & 324) that may be sealed:

Exhibit No. / Document Title	Bates No. / Pages with Designations	Parts to be sealed
Exhibit 2 ¹	Pgs. 4 – 30	Internal terms may be sealed only

¹ For Exhibit 2 of the Opposition, Google impermissibly seeks to seal entire pages of documents, claiming they show highly sensitive and confidential information about proprietary consent

Exhibit No. / Document Title	Bates No. / Pages with Designations	Parts to be sealed
Exhibit 3	GOOG-RDGZ-00056514 Complete document	Internal processes; Internal terms; Internal strategy; Employee PII
Exhibit 5	44:21-22	Internal terms may be sealed only
	72:16; 72:21	Internal terms may be sealed only
<i>Exhibit 6</i>	<i>Addressed in Exhibit 7 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</i>	The sealed records must comport with the court's order in the row corresponding to Exhibit 7 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.
<i>Exhibit 6-A</i>	<i>Addressed in Exhibit 8 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</i>	The sealed records must comport with the court's order in the row corresponding to Exhibit 8 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.
Exhibit 8	Pg. 4	Employee PII may be sealed only
<i>Exhibit 9</i>	<i>Addressed in Exhibit 5 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</i>	The sealed records must comport with the court's order in the row corresponding to Exhibit 5 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.

checking processes within Google's storage infrastructure. However, this sealing request is too broad. Google may seal internal terms only.

Exhibit No. / Document Title	Bates No. / Pages with Designations	Parts to be sealed
<i>Exhibit 11</i>	<i>Addressed in Exhibit 1 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</i>	The sealed records must comport with the court's order in the row corresponding to Exhibit 1 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.
Exhibit 13	Pg. 91, Footnote 280	Internal terms may be sealed only
Exhibit 14	Pg. 6, lines 24-28	Internal terms may be sealed only
	Pg. 7, lines 1-5, 6-16	Internal terms may be sealed only
<i>Exhibit 19</i>	<i>Addressed in Exhibit 1 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.</i>	The sealed records must comport with the court's order in the row corresponding to Exhibit 1 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.
Exhibit 21	Pg. 12, 4-5	Internal terms may be sealed only
	Pg. 14, line 23	Internal terms may be sealed only
	Pg. 15, lines 13, 17-18, 24-27	Internal terms may be sealed only
	Pg. 16, lines 1-28	Internal terms may be sealed only, the entire page may not be sealed
	Pg. 17, lines 1-28	Internal terms may be sealed only
	Pg. 18, lines 1-21	Internal terms may be sealed only
	Pg. 19, lines 1-8	Internal terms may be sealed only

The table below lists exhibits to Plaintiffs' Reply in support of their Motion for Class

Certification (Dkt. 333) that may be sealed:

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
Exhibit 70	223:8	Internal data log detail may be sealed only
	223:10	Internal data log detail may be sealed only
	223:13	Internal data log detail may be sealed only
	223:20	Internal data log detail may be sealed only
	223:25	Internal data log detail may be sealed only
	224:6	Internal data log detail may be sealed only
	225:10	Internal data log identifier may be sealed only
	225:13	Internal data log identifiers may be sealed only
	225:17	Internal data log identifiers may be sealed only
	225:18	Internal data log identifiers may be sealed only
	225:19	Internal data log identifiers may be sealed only
	225:24	Internal data log details may be sealed only
Exhibit 71	GOOG-RDGZ-00149617	Internal terms may be sealed only
	GOOG-RDGZ-00149618	Internal terms may be sealed only
	GOOG-RDGZ-00149619	Internal terms may be sealed only
	GOOG-RDGZ-00149620	Internal terms may be sealed only
	GOOG-RDGZ-00149621	Internal terms may be sealed only

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
	GOOG-RDGZ-00149622	Internal terms may be sealed only
	GOOG-RDGZ-00149623	Internal terms may be sealed only
	GOOG-RDGZ-00149624	Internal terms may be sealed only
	GOOG-RDGZ-00149625	Internal terms may be sealed only
	GOOG-RDGZ-00149626	Internal terms and Employee PII may be sealed only
	GOOG-RDGZ-00149628	Internal terms may be sealed only
	GOOG-RDGZ-00149630	Internal terms may be sealed only

The table below lists exhibits to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert Michael J. Lasinski (Dkt. 326): that may be sealed:

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
Exhibit 1	Pgs. 24 – 270	Internal terms may be sealed only, to the extent there are any
Exhibit 3	Pg. 30, Footnote 116	Internal terms may be sealed only
	Pg. 50, Footnote 176	Internal terms may be sealed only
	Pg. 83, Footnote 285	Internal terms may be sealed only
Exhibit 5	Pgs. 153 – 376	Internal terms and figures (e.g. the one in 153:23) may be sealed only
Exhibit 7	Pg. 12, Para. 41	Internal terms/figures may be sealed only
	Pg. 13, Para. 43	Internal terms may be sealed only

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
	Pg. 14, Para. 43	Internal terms may be sealed only
	Pg. 21, Para. 60g	Internal terms may be sealed only
	Pg. 28, Para. 74, Footnote 84	Internal terms may be sealed only
	Pg. 31, Para. 80	Internal terms may be sealed only
	Pg. 32, Para. 83	Internal terms may be sealed only
	Pg. 33, Footnote 101	Internal terms may be sealed only
	Pg. 34, Para. 87, Para. .90	Internal terms may be sealed only
	Pg. 35, Para. 90, Para. 92	Internal terms may be sealed only
	Pg. 38, Para. 99	Internal terms may be sealed only
	Pg. 39, Para. 101	Internal terms may be sealed only
	Pg. 41, Para. 107, Footnotes 129 & 131	Internal terms may be sealed only
	Pg. 42, Footnote 132	Internal terms may be sealed only
	Pg. 48, Para. 123	Internal terms may be sealed only
	Pg. 50, Para. 128, Footnote 154	Internal terms may be sealed only
	Pg. 52, Para. 132	Internal terms may be sealed only
	Pg. 55, Para. 140, Para. 142	Internal terms may be sealed only
	Pg. 56, Para. 142	Internal terms may be sealed only
	Pg. 57, Para. 143, Para. 144, Paras. 145 – 146, Footnote 177	Internal terms may be sealed only

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
	Pg. 58, Para. 146	Internal terms may be sealed only and any PII may be sealed
	Pg. 59, Para. 146, Para. 147	Internal terms may be sealed only
	Pg. 60, Para. 151	Internal terms may be sealed only
	Pg. 62, Para. 155	Internal terms may be sealed only
	Pg. 64, Footnote 195	Internal terms may be sealed only
	Pg. 69, Para. 167, Footnote 210	Internal terms may be sealed only
	Pg. 70, Para. 169	Internal terms may be sealed only
	Pg. 71, Para. 169, Para. 170	Internal terms may be sealed only
	Pg. 73, Para. 174	Internal terms may be sealed only
	Pg. 75, Para. 178	Internal terms may be sealed only
	Pg. 81, Para. 192	Internal terms may be sealed only
	Pg. 86, Para. 201	Internal terms may be sealed only
	Pg. 93, Para. 214	Internal terms may be sealed only
Exhibit 8	Pg. 12	Employee PII may be sealed only
	Pg. 38. Para. 12-13	Any PII (including images) and internal terms may be sealed only
	Pg. 39, Paras. 14 – 16	Internal terms may be sealed only
	Pg. 40, Paras. 16 – 17	Internal terms and PII may be sealed

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
	Pg. 41, Paras. 17 – 19	Internal terms and PII may be sealed
	Pg. 42, Paras. 20 – 22	Internal terms and PII may be sealed
	Pg. 43, Paras. 22 – 24	Internal terms and PII may be sealed only
	Pg. 44, Paras. 24 - 26	Internal terms and PII may be sealed only
	Pg. 49, Para. 39	Internal terms may be sealed only.
	Pg. 50, Paras. 40 – 43	Internal terms and PII may be sealed only
	Pg. 51, Paras. 44 – 45	Internal terms and PII may be sealed only
Exhibit 10	Pg. 5, Line 19	Internal figures may be sealed only
	Pg. 6, Line 3	Internal figures may be sealed only
	Pg. 9, Lines 26 – 27	Internal terms may be sealed only
	Pg. 11, Lines 6 – 19, Lines 22 – 27	Internal terms may be sealed only
	Pg. 12, Lines 9 – 10	Internal terms may be sealed only
	Pg. 15, Line 1	Internal terms may be sealed only
	Pg. 16, Lines 3 – 28	Internal terms and figures may be sealed only
	Pg. 17, Lines 1 - 28	Internal processes; Internal terms
	Pg. 18, lines 1 – 21	Internal processes; Internal terms
	Pg. 19, Lines 1, 2-8, 11 – 28	Internal terms and figures may be sealed only
	Pg. 20, Lines 1 – 24	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Parts to be sealed
	Pg. 21, Lines 1 – 28	Internal processes; Internal terms
	Pg. 22, Lines 1 – 28	Internal processes; Internal terms
	Pg. 23, Lines 1 – 28	Internal processes; Internal terms
	Pg. 24, Lines 1 – 12	Internal processes; Internal terms
Declaration of Michael Lasinski in Support of Plaintiffs’ Motion for Class Certification	Generally	Public figures and calculations derived from them may not be sealed. Only internal terms, describing undisclosed and non-public projects or products, to the extent there are any, may be sealed. Employee PII may also be sealed. Google is not permitted to seal entire paragraphs, but the specific words or phrases that correspond with internal terms/employee PII.
	Pg. 38, Paras. 102	All portions of image except those in red rectangles
	PDF Pgs. 86 – 152	Only Google’s internal, non-public figures, to the extent that there are any, may be sealed. Public figures and calculations derived from them, which affect absent class members, may not be sealed.

The table below lists exhibits to Plaintiff’s Opposition to Google’s Motion to Exclude Opinion of Plaintiffs’ Damages Expert Michael J. Lasinski (Dkt. 331): that may be sealed:

Exhibit No.	Bates No. / Pages with Designations	Description
<i>Exhibit 1</i>	<i>Duplicative of Exhibit 1 to Google’s Motion to Exclude Opinion of Michael J. Lasinski</i>	The sealed records must comport with the court’s order in the row(s)

Exhibit No.	Bates No. / Pages with Designations	Description
		corresponding to Exhibit 1 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.
<i>Exhibit 3</i>	<i>Duplicative of Exhibit 3 to Google's Motion to Exclude Opinion of Michael J. Lasinski</i>	The sealed records must comport with the court's order in the row(s) corresponding to Exhibit 3 to Google's Motion to Exclude Opinion of Plaintiffs' Damages Expert M.J. Lasinski.
Exhibit 5	187:23-24	Internal terms
<i>Exhibit 6</i>	<i>Duplicative of Exhibit 15 to Plaintiffs' Motion for Class Certification</i>	The sealed records must comport with the court's order in the row(s) corresponding to Exhibit 15 to Plaintiffs' Motion for Class Certification
Exhibit 7	GOOG-RDGZ-00188469 Complete document	Internal processes, Internal terms
Exhibit 9		
	GOOG-RDGZ-00028473	Internal terms may be sealed only
	GOOG-RDGZ-00028474	Internal processes; Internal terms
	GOOG-RDGZ-00028475	Internal processes; Internal terms
	GOOG-RDGZ-00028476	Internal processes; Internal terms
	GOOG-RDGZ-00028477	Internal processes; Internal terms
	GOOG-RDGZ-00028478	Internal processes; Internal terms
	GOOG-RDGZ-00028479	Internal processes; Internal terms

Exhibit No.	Bates No. / Pages with Designations	Description
	GOOG-RDGZ-00028480	Internal processes; Internal terms
	GOOG-RDGZ-00028481	Internal processes; Internal terms
	GOOG-RDGZ-00028482	Internal processes; Internal terms; Internal strategy
	GOOG-RDGZ-00028483	Internal processes; Internal terms; Internal strategy
	GOOG-RDGZ-00028484	Internal processes; Internal terms; Internal strategy

The table below lists portions of Jonathan E. Hochman's Expert Report and Appendices that may be sealed:

Exhibit No.	Bates No. / Pages with Designations	Description
Report	Pg. 22, Para 51	Internal figures may be sealed only.
	Pg. 23, Footnote 32	Internal terms may be sealed only
	Pg. 24, Para. 54, 55, Footnote 36	Internal terms may be sealed only
	Pg. 26, Footnote 39	Internal terms may be sealed only
	Pg. 29, Para. 64	Internal terms may be sealed only
	Pg. 33, Footnote 62	Internal strategy
	Pg. 39, Footnote 74	Internal terms may be sealed only
	Pg. 50-52, Para. 110	Internal terms may be sealed only
	Pg. 52, Para. 112	Internal terms may be sealed only
	Pg. 53, Para. 114	Internal terms may be sealed only

Exhibit No.	Bates No. / Pages with Designations	Description
	Pg. 54, Paras. 115-117	Internal terms may be sealed only
	Pg. 55, Para. 120	Internal terms may be sealed only
	Pg. 56, Footnote 95	Internal processes
	Pg. 56-57, Para. 124	Internal terms may be sealed only
	Pg. 58, Para. 125	Internal terms may be sealed only
	Pg. 58-59, Para. 127	Internal terms may be sealed only
	Pg. 59, Para. 128	Internal terms may be sealed only
	Pg. 60-63, Para. 130	Internal code and terms may be sealed, but description by Hochman may not be sealed.
	Pg. 66-67, Para. 138	Internal figures may be sealed only.
	Pg. 67-69, Para. 141	Internal processes
	Pg. 67, Footnote 107	Internal figures may be sealed only
	Pg. 71, Footnote 113-114	Internal terms may be sealed only
	Pg. 72, Para. 149	Plaintiffs' designations
	Pg. 73, Para. 152	Employee PII may be sealed only
	Pg. 75-79, Paras. 159-165	Internal processes; Internal strategy
	Pg. 77, Footnote 118-119	Internal terms may be sealed only
	Pg. 79, Footnote 120	Internal terms may be sealed only
	Pg. 81, Para. 169	Internal terms may be sealed only
	Pg. 81-82, Para. 171	Internal processes;

Exhibit No.	Bates No. / Pages with Designations	Description
		Internal strategy
	Pg. 82, Paras. 173-174	Internal processes; Internal strategy
	Pg. 83-84, Paras. 175-177	Internal processes; Internal strategy
	Pg. 83, Footnote 128	Internal processes; Internal strategy
	Pg. 85, Para. 179	Internal terms may be sealed only
	Pg. 86, Para. 182	Plaintiffs' designations
	Pg. 88, Paras. 188-189	Internal terms may be sealed only
	Pg. 89-90, Para. 191	Plaintiffs' designations
	Pg. 89, Footnote 131	Plaintiffs' designations
	Pg. 91-92, Para. 192	Plaintiffs' designations
	Pg. 94, Para. 198	Internal terms may be sealed only
	Pg. 96, Para. 206	Internal terms may be sealed only
	Pg. 97, Para. 207	Internal terms may be sealed only
	Pg. 98, Para. 208	Internal processes, depicted in table format, may be sealed only
	Pg. 100, Paras. 213-214	Internal terms may be sealed only
	Pg. 100-101, Para. 216	Internal terms may be sealed only
	Pg. 101, Paras. 217-218	Internal terms may be sealed only
	Pg. 102-103 Paras. 220-222	Internal terms may be sealed only
	Pg. 104-106, Paras. 230-231	Internal terms may be sealed only
	Pg. 106-108, Para. 232 and Footnote	Internal terms may be

Exhibit No.	Bates No. / Pages with Designations	Description
	140	sealed only
	Pg. 108-109, Paras. 233-235	Internal processes; Internal terms
	Pg. 110, Para. 237	Internal terms
	Pg. 110-111, Paras. 238-239	Internal terms may be sealed only
	Pg. 111, Footnote 141	Internal terms may be sealed only
	Pg. 111-113, Paras. 241-243	Internal terms may be sealed only
	Pg. 113, Paras. 244-245	Plaintiffs' designations
	Pg. 113-114, Para. 246	Plaintiffs' designations
	Pg. 114, Footnote 144	Internal terms may be sealed only
	Pg. 114, Para. 248	Internal terms may be sealed only
	Pg. 116, Footnote 145	Internal figures may be sealed only
	Pg. 122, Para. 273	Internal processes, depicted in the attached image, may be sealed only.
	Pg. 127, Para. 286	Internal terms and figures may be sealed only
	Pg. 131-132, Paras. 299-300	Internal processes; Internal terms
	Pg. 132-133, Para. 303	Internal terms may be sealed only
	Pg. 133-134, Paras. 305-309	Internal terms may be sealed only
	Pg. 134, Footnote 159	Internal terms may be sealed only
	Pg. 136, Para. 312	Internal processes and terms, depicted in the attached image, may be sealed only
	Pg. 137-138, Paras. 318-319 and	Internal terms may be

Exhibit No.	Bates No. / Pages with Designations	Description
	Footnote 162	sealed only
	Pg. 138-141, Paras. 320-324	Internal terms may be sealed only
	Pg. 139, Footnote 163-164	Internal terms may be sealed only
	Pg. 140, Footnote 165	Internal terms may be sealed only
	Pg. 141, Para. 326	Internal terms may be sealed only
	Pg. 142-143, Para. 330	Everything after “As show in the figure” and the figure itself may be sealed.
	Pg. 148, Para. 348	Internal figures may be sealed
	Pg. 150, Para. 353	Internal term may be sealed only
	Pg. 150, Para. 355	Internal figures may be sealed only
	Pg. 150, Footnote 173-174	Internal processes; Internal strategy
	Pg. 151, Para. 358	Internal terms may be sealed only
	Pg. 152, Para. 360	Internal terms may be sealed only
	Pg. 153, Para. 364	Internal terms may be sealed only
	Pg. 154, Para. 367	Internal terms may be sealed only
	Pg. 154, Footnote 175	Internal terms may be sealed only
	Pg. 157, Para. 375	Employee PII may be sealed only
	Pg. 162, Para. 388	Internal terms may be sealed only
	Pg. 168, Footnote 180	Internal processes; Internal strategy

Exhibit No.	Bates No. / Pages with Designations	Description
Appendix E	Pg. 7, Para. 13	Internal terms may be sealed only
	Pg. 10, Paras. 20-21	Internal processes; Internal strategy
	Pg. 10, Footnote 24	Internal processes
	Pg. 11-13, Paras. 23-26	Internal terms may be sealed only
	Pg. 14, Para. 28	Internal terms may be sealed only
Appendix G	Pg. 1, Table of Contents	Internal terms may be sealed only
	Pg. 11, Para. 26	Internal terms may be sealed only
	Pg. 11, Heading 2.1	Internal terms
	Pg. 11-30, Paras. 28-73	Internal processes; Internal strategy; Internal terms
	Pg. 31, Para. 74	Internal terms may be sealed only
	Pg. 32, Paras. 79-80	Internal terms may be sealed only
	Pg. 33, Paras. 83-85	Internal terms may be sealed only
	Pg. 34-37, Paras. 86-98	Internal processes; Internal strategy; Internal terms
	Pg. 37, Para. 100	Internal terms may be sealed only
	Pg. 39, Para. 106	Internal processes; Internal terms
	Pg. 40-41 ,Paras. 109, 111-113	Internal processes; Internal terms
	Pg. 42-43, Paras. 115-121	Internal processes; Internal terms
	Pg. 44-102	Internal processes; Internal strategy; Internal terms

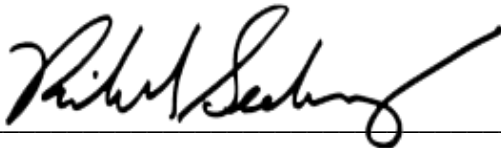
Exhibit No.	Bates No. / Pages with Designations	Description
Appendix I	Pg. 5, Paras. 13-14	Internal terms may be sealed only
	Pg. 28-29, Paras. 65-66	Internal terms may be sealed only
Appendix K	Complete Document	Internal processes; Internal strategy; Internal terms

IV. CONCLUSION

For the reasons above, the parties’ omnibus motion to seal is granted in part and denied in part. Plaintiffs and Google are ordered to file public versions of the records above in compliance with this order.

IT IS SO ORDERED.

Dated: January 3, 2024



RICHARD SEEBORG
Chief United States District Judge